

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**WALTER AND VIRGINIA SALMONS, INDIVIDUALLY AND  
AS NEXT FRIEND AND GUARDIAN OF BABY W.S.;**

**ANTHONY ANDERSON, INDIVIDUALLY  
AND AS NEXT FRIEND  
AND GUARDIAN OF BABY A.L.A., ON BEHALF OF THEMSELVES  
AND ALL OTHERS SIMILARLY SITUATED;**

**AND  
HADEN TRAVIS BLANKENSHIP,  
INDIVIDUALLY AND AS NEXT FRIEND  
AND GUARDIAN OF BABY Z.D.B.,  
ON BEHALF OF THEMSELVES  
AND ALL OTHERS SIMILARLY SITUATED,**

**Plaintiffs,**

**v.**

**MDL No. 2804  
Judge Dan Aaron Polster  
CASE NO. 1:18-op-45268-DAP**

**MCKESSON CORPORATION;  
CARDINAL HEALTH, INC.;  
AMERISOURCEBERGEN CORPORATION;  
TEVA PHARMACEUTICAL INDUSTRIES,  
LTD.; TEVA PHARMACEUTICALS USA, INC.;  
CEPHALON, INC.;  
MYLANHARMACEUTICALS, INC.; JOHNSON  
& JOHNSON; JANSSEN PHARMACEUTICALS,  
INC.; ORTHO-MCNEIL-JANSSEN  
PHARMACEUTICALS, INC. n/k/a JANSSEN  
PHARMACEUTICALS, INC.; JANSSEN  
PHARMACEUTICA INC. n/k/a JANSSEN  
PHARMACEUTICALS, INC.; ENDO HEALTH  
SOLUTIONS INC.; ENDO  
PHARMACEUTICALS, INC.; ALLERGAN PLC  
f/k/a ACTAVIS PLC; WATSON  
PHARMACEUTICALS, INC. n/k/a ACTAVIS,  
INC.; WATSON LABORATORIES, INC.;  
ACTAVIS LLC; and ACTAVIS PHARMA, INC.  
f/k/a WATSON PHARMA, INC., DEPOMED, INC.;  
MALLINCKRODT LC; ALLINCKRODT PLC;**

**CLASS ACTION COMPLAINT  
JURY TRIAL DEMANDED**

**SPECGX LLC; PAR PHARMACEUTICAL, INC.;  
PAR PHARMACEUTICAL COMPANIES,  
INC.; NORAMCO, INC.; INDIVIOR, INC.;  
CVS HEALTH CORPORATION; RITE AID OF  
MARYLAND, INC.; RITE AID CORP.;  
WALGREENS BOOTS ALLIANCE, INC.;  
WALGREEN EASTERN CO.; WALGREEN CO.;  
WAL-MART INC. f/k/a WALMART STORES,  
INC.; MIAMI-LUKEN, INC.; COSTCO  
WHOLESALE CORPORATION;  
H.D. SMITH, LLC; H.D. SMITH HOLDINGS, LLC;  
H.D. SMITH HOLDING COMPANY; ANDA, INC.**

**Defendants.**

**INTERROGATORIES**  
**and**  
**REQEUST FOR PRODUCTION OF DOCUMENTS**

Plaintiffs, Anthony Anderson, II, Legal Guardian of Child Anthony Anderson, III; Haden Blankenship, Legal Guardian of Child Zane Blankenship and Virginia and Walter Salmons, Legal Guardian of Child Waylon Dingess Salmons, on Behalf of Themselves and All Other Similarly Situated Legal Guardians, by and through undersigned counsel, pursuant to Rule 34 of the Federal rules of Civil Procedure, hereby propounded the following Interrogatories and Request for Production of Documents to Defendants, MCKESSON CORPORATION; CARDINAL HEALTH, INC.; AMERISOURCEBERGEN CORPORATION; TEVA PHARMACEUTICAL INDUSTRIES, LTD.; TEVA PHARMACEUTICALS USA, INC.; CEPHALON, INC.; YLANHARMACEUTICALS, INC.; JOHNSON & JOHNSON; JANSSEN PHARMACEUTICALS, INC.; ORTHO-MCNEIL-JANSSEN PHARMACEUTICALS, INC. n/k/a JANSSEN PHARMACEUTICALS, INC.; JANSSEN PHARMACEUTICA INC. n/k/a JANSSEN PHARMACEUTICALS, INC.; ENDO HEALTH SOLUTIONS INC.; ENDO PHARMACEUTICALS, INC.; ALLERGAN PLC f/k/a ACTAVIS PLC; WATSON PHARMACEUTICALS, INC. n/k/a ACTAVIS, INC.; WATSON LABORATORIES, INC.;

ACTAVIS LLC; and ACTAVIS PHARMA, INC. f/k/a WATSON PHARMA, INC., DEPOMED, INC.; MALLINCKRODT LLC; MALLINCKRODT PLC. . Your responses to these interrogatories or requests for production are due within thirty (30) days from the date of service.

**DEFINITIONS:**

As used in these Interrogatories and Requests:

1. “Child/Baby” means or refers to Waylon D. Salmons; Anthony L. Anderson, III and/or Zane Blankenship.
2. “Legal Guardian” means or refers to Virginia and/or Walter Salmons; Anthony L. Anderson, II and/or Haden T. Blankenship.
3. “Birth Mother” means or refers to Ollie Marie Salmons; Stacey Anderson and Christina Blankenship.

**INTERROGATORIES**

1. Please describe any and all toxicological, pharmacological, pharmo-kinetic, longitudinal or other scientific study of opioids conducted on animals in your possession including in the description the title of such studies, date of issuance, who led the study, whether the study was provided to the FDA, and the cost of the study.
2. Please describe any and all toxicological, pharmacological, pharmo-kinetic, longitudinal, clinical trial or other scientific study of opioids conducted on humans in your possession including in the description the title of such studies, date of issuance, who led the study, who funded the study and the cost of the study.
3. Please describe all scientific studies of any sort in your possession, not listed above, that address genotoxicity, teratogenic, mutagenic or development impacts of in utero exposure to opioids.

4. Identify all witnesses you will or may call at the Class Certification Hearing. Provide their full name, address and state the facts you intend to prove and/or disapprove with each witness. State if they are a lay or expert witness; if expert, state their opinions and the basis thereof.

**REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All studies described in your response to Interrogatory Nos. 1, 2 and 3 above.
2. All emails, memos, presentations, white papers or other documents related to your response to Interrogatories Nos. 1, 2 and 3 above.
3. Please provide any and all documents in your possession that contain the words “Neonatal Abstinence Syndrome”, “NAS”, “infant”, “baby(ies)”, “spina bifida” “club foot” or “in utero”.
4. Please provide any and all documents related to studies of rats or rabbits exposed to opioids.
5. All non-privileged documents in your possession relating to:

- Baby: Anthony L. Anderson, III
- Guardian: Anthony L. Anderson, II
- Birth Mother: Stacey Anderson
- Birth City: Charleston, WV

and

- Baby: Zane Blankenship
- Guardian: Haden Blankenship
- Birth Mother: Christina Blankenship
- Birth City: Princeton, WV

and

- Baby: Waylon D. Salmons
- Guardian: Virginia and Walter Salmons
- Birth Mother: Ollie Marie Salmons
- Birth City: Charleston, WV

and

- Expert: Harvey Rosen
- Expert: Charles Vyvyan Howard
- Expert: Charles Livingston Werntz, III

6. All documents, things, charts or demonstrative evidence you will or may use at the Class Certification Hearing.
7. Produce all prescription records for Anthony L. Anderson, III and his birth mother within one hundred fifty (150) miles of Charleston, WV; for Zane Blankenship and his birth mother within one hundred fifty (150) miles of Princeton, WV and for Waylon D. Salmons and his birth mother within one hundred fifty (150) miles of Charleston, WV.

**DATED:** October 15, 2019.

Respectfully submitted by:

/s/ Marc E. Dann

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed via the Court's electronic filing system on October 15, 2019. Notice of this filing will be sent by e-mail through the Court's electronic case-filing system to all counsel of record.

/s/Celeste Brustowicz  
Celeste Brustowicz